

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEIRDRE N. COSMANN,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:22-cv-00933-PTG

DEFENDANT’S OBJECTIONS TO PLAINTIFF’S EXHIBITS

In accordance with the Court’s Scheduling Order dated March 9, 2023 (ECF No. 23) and the Federal Rules of Evidence (“FRE”), Defendant Booz Allen Hamilton Inc. (Defendant”), by and through undersigned counsel, hereby files its objections to Plaintiff Deirdre Cosmann’s proffered trial exhibits.

Defendant objects generally to the admissibility of any and all exhibits designated by Plaintiff on the grounds and to the extent that any such exhibits constitute hearsay, lack foundation, are prejudicial, are irrelevant and immaterial or relevant to only collateral matters, are unreasonably cumulative or duplicative; and/or excluded by any Order of this Court.

By setting forth the following objections, Defendant does not waive any additional objections it may seek to raise at trial and expressly reserve any such objections.

Plaintiff's Exhibit Number	Objections
21	Relevance Prejudicial
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543	Defendant was never provided a document identified as “Cosmann 3231-3232” and

	therefore has not been able to determine whether this exhibit was previously produced under a different Bates label. Because this exhibit may not have been previously exchanged, Defendant reserves the right to make objections.
544	Relevance Hearsay Authentication Prejudicial
545	Relevance Hearsay Authentication Prejudicial

Dated: July 31, 2023

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

/s/ Ajente Kamalanathan

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2023, I caused the foregoing to be filed electronically and served on all counsel of record using the CM/ECF system upon the following:

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